

Hearing Date and Time: October 6, 2009, at 9:45 a.m. (Prevailing Eastern Time)
Objection Deadline: October 1, 2009 at 4:00 p.m. (Prevailing Eastern Time)

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COUNSEL FOR THE AD HOC COMMITTEE OF
ASBESTOS PERSONAL INJURY CLAIMANTS

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----)
In re) Chapter 11
)
MOTORS LIQUIDATION COMPANY, et al.) Case No. 09-50026 (REG)
f/k/a General Motors Corp., et al.) (Jointly Administered)
)
Debtors,)
-----)

**AD HOC COMMITTEE OF ASBESTOS PERSONAL INJURY
CLAIMANTS' OBJECTION TO MOTION OF REMY INTERNATIONAL FOR AN
ORDER EXTENDING AND ENFORCING
THE STAY IMPOSED UNDER 11 U.S.C. § 362(a) TO INCLUDE
CERTAIN LITIGATION AGAINST REMY INTERNATIONAL, OR
ALTERNATIVELY, ENJOINING SUCH
LITIGATION PURSUANT TO 11 U.S.C. § 105**

TO THE HONORABLE ROBERT E. GERBER,
UNITED STATES BANKRUTPCY JUDGE:

The Ad Hoc Committee of Asbestos Personal Injury Claimants (the "Ad Hoc Committee")¹ hereby files this objection to the Motion of Remy International for an

¹ The Ad Hoc Committee of Asbestos Personal Injury Claimants is comprised of William J. Lewis a mesothelioma claimant with a settled but unpaid claim, represented by SimmonsCooper LLC; Maureen Tavaglione, Personal

Order Extending and Enforcing the Stay Imposed Under 11 U.S.C. § 362(a) to Include Certain Litigation Against Remy International, or Alternatively, Enjoining Such Litigation Pursuant to 11 U.S.C. § 105 (the “Stay Motion”), and shows this Court as follows:

ARGUMENT

The Ad Hoc Committee incorporates herein its arguments set forth in its Ad Hoc Committee of Asbestos Personal Injury Claimants’ Objection to Motion of Detroit Diesel Corporation for Order Extending and Enforcing the Stay Imposed Under 11 U.S.C. § 362(a) to Cover Certain Litigation Relating to Detroit Diesel Corporation, or Alternatively, Enjoining Such Litigation Pursuant to 11 U.S.C. § 105, filed October 1, 2009 [Dkt. No. 4144].

CONCLUSION

WHEREFORE the Ad Hoc Committee for Asbestos Personal Injury Claimants respectfully request that the Court enter an order (1) denying the relief requested in the Motion of Remy International for an Order Extending and Enforcing the Stay Imposed Under 11 U.S.C. § 362(a) to Include Certain Litigation Against Remy International, or Alternatively, Enjoining Such Litigation Pursuant to 11 U.S.C. § 105; (2) granting leave for the Asbestos Plaintiffs to prosecute their

Representative of the Estate of Robert J. Tavaglione, represented by Waters & Kraus; Terry Roth, a lung cancer claimant, represented by Brayton Purcell LLP; Jene Moore, Sr., a mesothelioma claimant represented by Early Ludwick & Sweeney L.L.C.; Edward Levitch, a mesothelioma claimant represented by Paul & Hanley LLP and Kenneth Knight, a mesothelioma claimant, represented by The Lanier Law Firm PLLC. Asbestos personal injury claimants represented by Cooney and Conway and Steven Kazan, Kazan, McClain, Lyons, Greenwood & Harley, PLC, serve as an *ex officio members*.

claims; and (3) granting the Ad Hoc Committee for Asbestos Personal Injury Claimants such other and further relief to which it may be entitled.

Dated: October 1, 2009

Respectfully submitted,

**STUTZMAN, BROMBERG, ESSERMAN &
PLIFKA, A PROFESSIONAL CORPORATION**

By: Peter C. D'Apice
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